**Remarks/Arguments:**

Claims 1-30 are pending in this application.

Claims 1 and 30 are rejected under 35 U. S. C. 102(b) as being anticipated by Todd (US 6,155,348). Applicants' method is markedly different from Todd's. Todd states at column 2, line 58, to column 3, line 12:

> "The methods of this invention are basically comprised of the steps of first placing an explosive which is detonatable from the surface in the well bore adjacent to the producing zone to be stimulated. At least one fracture is next created extending from the well bore into the zone and hardenable resin composition coated proppant is deposited in the zone by way of the well bore. Some of the resin composition coated proppant is also deposited in the well bore adjacent to the zone around the explosive therein. The resin composition is caused to harden whereby the proppant deposits in the fracture and in the well bore are consolidated into hard permeable masses. Thereafter, the explosive is detonated to thereby break up and cause the removal of at least a substantial portion of the consolidated proppant in the well bore. The consolidated proppant in the fracture filters out and prevents the migration of formation sand with fluids produced through the fracture into the well bore.
>
> The removal of at least some or all of the consolidated proppant from the well bore allows produced fluids from the fractures to more freely flow into the well bore and allows subsequent access to the producing zone by way of the well bore in the event remedial procedures are required therein."

Todd describes a method in which an explosive is first placed in a wellbore, then a fracture is created by injecting resin-coated proppant, the proppant is consolidated, and then the explosive is detonated to break up and remove consolidated proppant in the well bore. Applicants have described and claimed a method in which a mixture of proppant and noisy particulate material is prepared and pumped into a formation and discharged. Applicants believe claim 1 is not anticipated by Todd.

Regarding claim 30, Todd's statement that his method "allows produced fluids from the fractures to more freely flow into the well bore" clearly means that after his

treatment, production will be improved, because some consolidated proppant will have been removed from the wellbore. Applicant's wording in claim 30 that "the discharge provides localized high rate fluid motion" (as disclosed in paragraph [0048]) means that there is rapid fluid motion at the location of each discharge at the time of the discharge.

Claims 2-29 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims. Applicants believe that claim 1 is allowable; all of claims 2-29 are directly or indirectly dependent on claim 1.

In light of the above arguments, Applicants respectfully request prompt allowance of all pending claims.

Should any additional fees be due, the Commissioner is hereby authorized to deduct said fees from Deposit Account No. 04-1579 (56.0692).

Respectfully submitted,

Thomas O. Mitchell
Reg. No. 47,800
Agent for Applicants

Date: April 6, 2006

Schlumberger Technology Corporation
110 Schlumberger Drive, MD-1
Sugar Land, Texas 77478
Ph: 281-285-4490
Fax: 281-285-8569